

ETEXT ATTACHMENT

09/18/2002 22 : 04

September 18, 2002

Brandy Phillips
Reports Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00307405

Reference: PPP July Monthly Report (6/1/02 - 6/30/02)

Dear Ms. Phillips:

U This letter is in response to your request for additional information, dated September 6, 2002 and received by the Keep Our Majority PAC on September 10, 2002.

U You indicate that our report discloses in-kind activity incorrectly. Although the in-kind activity was correctly itemized on Schedule A and Schedule B, the amount was not reflected on the Detailed Summary Page. This report has been amended to include the amount on the Detailed Summary Page.

U As we have indicated in previous responses, all transfers from the non-federal account for joint activity occur within the 70-day time period. Because reporting periods are 31 days or less, and the transfer period is within a 70-day time period, expenses itemized on Line 21 (a)(ii) and transfers from the non-federal account reported on Line 18 are usually different amounts.

U Your letter inaccurately states that the \$15,219.62 in transfers from the non-federal account for joint activity was for THIS reporting period. As you further note in your letter, transfers for shared activity must occur within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. Transfers from the non-federal account which are itemized on the July Monthly Report could include activity itemized on Line 21(a)(ii) of the May Monthly Report.

This reporting period was only 30 days of activity. The transfers from the non-federal account are made for payments to vendors from PREVIOUS reporting periods, but still well within the 60 days after the actual payments to the vendors were made. It is inaccurate to state that transfers made from the non-federal account for joint activity always equal the actual non-federal share of disbursements disclosed in any single reporting period.

These transfers were NOT prohibited activities, no transfers back to the non-federal account are required, and no further action by the Commission is warranted.

Sincerely,

Lisa R. Lisker
Assistant Treasurer